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**PROTECTING THE PUBLIC:
The Bureau of Alcohol, Tobacco and
Firearms' Youth Crime Gun
Interdiction Initiative Program
Implementation**

OIG-03-019

November 20, 2002



Office of Inspector General

The Department of the Treasury

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Abbreviations

ATF	Bureau of Alcohol, Tobacco and Firearms
FEA	Firearms, Explosives and Arson
FFL	Federal Firearms Licensee
FO	Field Operations
FTE	full-time equivalent
GAO	The General Accounting Office
IVRS	Integrated Violence Reduction Strategy
NTC	National Tracing Center
OIG	Office of Inspector General
U.S.	United States
YCGII	Youth Crime Gun Interdiction Initiative

*The Department of the Treasury
Office of Inspector General*

November 20, 2002

Bradley A. Buckles
Director
Bureau of Alcohol, Tobacco and Firearms

The Bureau of Alcohol, Tobacco and Firearms (ATF) is responsible for enforcing the Federal firearms laws. The Youth Crime Gun Interdiction Initiative (YCGII) is a component of ATF's overall firearms enforcement program, the Integrated Violence Reduction Strategy (IVRS). In fiscal year 2002, roughly ten percent of ATF's annual budget (\$85 million and 480 Full-Time Equivalents {FTEs}) was appropriated to YCGII.

We performed this audit to assess the corrective actions taken by ATF in response to our audit report issued in August 2000 on YCGII program implementation (*Final Report on the Bureau of Alcohol, Tobacco and Firearms' Implementation of the Youth Crime Gun Interdiction Initiative (OIG-00-119), August 21, 2000*). The specific objectives were to determine if ATF had (1) developed and implemented formal guidance and methodology to assist YCGII cities and field offices and to ensure the accuracy of YCGII statistical data, (2) implemented electronic trace procedures at YCGII cities, (3) ensured that local agencies were aware of available ATF resources, and (4) developed YCGII performance measures that accurately measure YCGII's impact on traffickers who supply firearms to youths.

The audit fieldwork was performed from April to June 2002. We conducted fieldwork at ATF's Washington, DC Headquarters and at the Atlanta, Chicago, and Indianapolis field divisions, where we interviewed ATF officials, and evaluated records and procedures. The scope of the review covered the corrective actions taken by ATF since the previous audit report was issued. See Appendix 1

for a more detailed description of the audit objectives, scope, and methodology.

Results in Brief

As a result of a prior Office of Inspector General (OIG) audit, ATF agreed to implement specific changes to its YCGII program. These changes included providing additional guidance to field offices and improving communication between ATF and State and local police departments. ATF also agreed to develop new performance measures that gauged YCGII's affect on trafficking of firearms to youths.

Based on our review of prior audit recommendations, ATF's corrective actions and current conditions, we concluded that ATF adequately implemented six of nine recommendations from the prior audit. ATF needs to perform further work for three recommendations.

We found that field offices may not have received additional staffing as a result of their cities' participation in the YCGII program. Many YCGII cities had just one group of eight to ten employees, who were required to perform a variety of functions. The limited number of special agents and multi-tasking of responsibilities may result in inadequate resources being devoted to participating YCGII cities.

ATF is in the process of developing performance measures that show YCGII's impact on youth crime. The Government Performance and Results Act of 1993 requires that Government agencies put a greater emphasis on the results (outcomes) of Government programs, rather than focusing on program outputs. Efforts to develop performance measures are ongoing.

Lastly, ATF's definition of what constituted a YCGII case was not clear. Cases identified as YCGII varied between field offices. As a result ATF could not ensure the accuracy of YCGII data.

We made four recommendations in the draft report. The ATF Director should ensure that the staffing for field offices is adjusted to ensure that YCGII cities are staffed in proportion to their YCGII activity. The staffing for field offices is periodically re-evaluated as YCGII cities are added and additional staffing becomes available.

The proposed IVRS performance measures are re-examined to ensure that they reflect the performance of all IVRS programs, including YCGII. Clear and concise criteria are developed to ensure consistent implementation of YCGII.

ATF concurred with the three findings and four recommendations. As a result, ATF will continue to examine their staffing model to adjust them for crime rates and varying needs of the individual localities. The staffing for new YCGII cities will be part of their staffing model. They are in the process of reviewing reports by the Department of Justice in specific IVRS areas and they have distributed an internal survey to their affected offices to determine what other factors are present that might have a positive or negative impact on firearms crime. ATF stated that the performance measures are a work in progress and they will continue to refine performance measures to ensure accuracy in measuring YCGII efforts. Lastly, to ensure validity of information, ATF is developing a plan to sample and validate case/time data.

Background

In July 1996, ATF announced YCGII as a program to strengthen enforcement efforts against crime gun traffickers who supply firearms to youths. At the time YCGII began, homicides committed by young people with firearms had nearly tripled since 1985, and other types of gun-related violence were on the rise. YCGII was implemented in 17 pilot cities and was expanded to 27 cities in 1999. Currently there are 50 cities participating in the program. In order to identify and stop the illegal sources of firearms to youths in these cities, YCGII has the following primary goals:

- Ensure 100 percent of all recovered crime guns are traced through ATF's National Tracing Center,
- Conduct research and analysis to determine community-wide patterns and trends,
- Produce an annual report for State and local authorities for use in making informed enforcement strategies, focused on the reduction of firearms violence and the interdiction of firearms to age groups of concern, and

-
- Use this information to increase the effectiveness of enforcement efforts in the apprehension and prosecution of those who illegally possess and traffic firearms.

To achieve these goals, police departments that join YCGII made a commitment to submit trace requests to ATF's National Tracing Center (NTC) on all crime guns recovered in their jurisdictions. The NTC then works with law enforcement agencies, firearms manufacturers and Federal Firearms Licensees (FFL) to determine the manufacturing and initial sale history of the firearms. This information provides investigative leads to develop cases against illicit firearms traffickers who supplied firearms to youths. ATF uses this information to generate reports that provided information about illegal firearms activity by community. These reports enable law enforcement agencies to focus their limited resources where they have the greatest impact on reducing firearms violence.

When a city is designated a YCGII city, ATF agrees to take a focused approach towards youths who illegally possess firearms and individuals who traffic firearms to youths in and out of that city. ATF designates a special agent as YCGII coordinator for each participating city. The YCGII coordinator is responsible for acting as a liaison with local agency personnel to enlist their support and ensure that trace request submissions are complete and accurate. The coordinator surveys a participating city's data collection practices to determine how each agency collects information for gun trace requests, identifies the agency's procedures relating to firearms with obliterated serial numbers, and identifies the agency personnel tasked with the collection and transmission of trace request data to the NTC. The YCGII coordinator arranges for ATF to provide training and technical help to local agencies when needed. In general, ATF plans to provide eight FTEs for each YCGII city.

YCGII is a component of ATF's overall firearms enforcement program, IVRS. In fiscal year 2002, roughly ten percent of ATF's annual budget (\$85 million and 480 FTEs) was appropriated to YCGII.

During FY 2000, the OIG issued three audit reports related to YCGII. The reports included a number of recommendations aimed at improving ATF's implementation of YCGII and strengthening its

controls over YCGII resources. This review was a follow-up to a prior OIG report.

Results of Prior Audit and Corrective Action Taken by ATF

In August 2000, OIG issued *Final Report on the Bureau of Alcohol, Tobacco and Firearms' Implementation of the Youth Crime Gun Interdiction Initiative* (OIG-00-119), which identified three findings and nine recommendations pertaining to the implementation of ATF's YCGII program. ATF agreed with these findings and recommendations and agreed to take corrective actions. Each finding is discussed below. The OIG's nine recommendations and actions taken by ATF are shown in more detail in Appendix 2.

Field Offices Need Additional Guidance

In our prior audit, we found that activities important to the implementation of YCGII were not always being performed. Certain field offices were not providing cities with all of the assistance necessary to help ensure that all firearms recovered in crimes were submitted for trace requests. These activities were not performed because YCGII coordinators were not aware of existing guidance, had other responsibilities, or adequate staffing was not available.

Also, ATF had not sufficiently developed a method to ensure that appropriate special agent resources were available in field offices to conduct YCGII-related activities. As a result of funding, field divisions with YCGII cities were to assign a minimum of six special agents to the YCGII program. These special agents were to focus a majority of their time on YCGII firearms investigations. ATF would then hire six new special agents to replace those assigned to YCGII.

To address these issues, ATF agreed to develop formal guidance to assist their field offices in implementing YCGII that included a model of best practices for YCGII coordinators. ATF also agreed to develop formal procedures for allocating special agents to the YCGII program and ensure that field offices implemented these procedures.

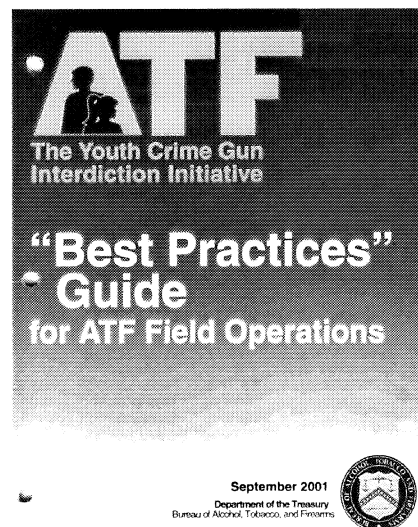
Corrective Action Taken

ATF developed formal guidance for field offices, which included the YCGII "Best Practices" Guide. This guide provided information on YCGII coordinator duties, ATF tools available to participants, and the selection criteria for YCGII cities. ATF issued policy memorandums to the field offices; held YCGII conferences for ATF personnel, State and local agency personnel, and United States (U.S.) Attorneys; and performed site visits to provide support and assess performance. In addition, each division was surveyed to see what services were being used and what resources were needed. If necessary, ATF would supply hardware, software and manpower to the YCGII cities. These steps were taken to assist field offices in the proper implementation of the YCGII program.

ATF issued guidance to field offices, which stated that one of the goals of IVRS was to address youth violence. In general ATF planned eight FTEs per YCGII city. This normally included six special agents, an inspector and a support person. Whenever possible the core group of YCGII employees in a city was to concentrate on comprehensive crime gun tracing.

In their 2003 Budget Request, ATF stated that they planned to place personnel in smaller cities that do not currently have an ATF presence. This will allow them to implement the President's Project Safe Neighborhoods program by using lessons learned from YCGII. This program will address the youth crime problem overall and firearms crimes in smaller cities as well.

ATF's method of allocating staff to YCGII cities did not ensure that sufficient resources were available. Some YCGII cities had only one group of eight to ten employees. These employees had to perform a variety of duties, such as bombing investigations, arson, and other general firearms cases. These other responsibilities limit the time available for YCGII related activities. While ATF has developed a method for staff allocation, other factors also impact its ability to implement YCGII



effectively. This issue will be discussed in detail in Finding 1 of this report.

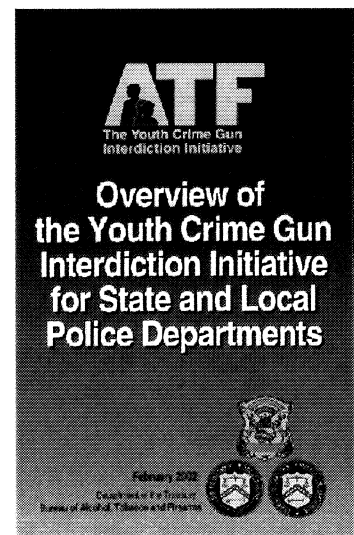
Better Communication Needed Between ATF and Police Departments

In our prior audit, we found that some police departments were not tracing all recovered guns and/or using ATF's analytical tools. An underlying cause of these problems was a lack of communication between ATF and the local police departments. Police departments were either not familiar with or did not avail themselves of ATF's analytical tools. Not all ATF field offices regularly communicated with police departments to verify that trace requests were submitted for all recovered firearms, and to determine the resources needed to ensure the cities' active YCGII participation.

ATF agreed to improve communication by providing more specific guidance to State and local agencies. ATF also agreed to assist cities that had trouble implementing YCGII, and develop procedures for terminating cities that chose not to participate in the program. ATF agreed to ensure that State and local agencies had access to electronic trace submission software and were aware of available ATF analytical tools.

Corrective Action Taken

ATF developed a best practices guide for YCGII cities. This document, "Overview of the Youth Crime Gun Interdiction Initiative for State and Local Police Departments" (February 2002) detailed the goals and objectives of YCGII and ways to ensure a successful program. It identified such practices as ensuring that all recovered crime guns were traced through the NTC as soon as possible and ensuring personnel involved in the tracing initiative were trained appropriately. It also recommended that all violators be interviewed to establish the source, identity of other possessors, particularly gang members and violent offenders, and identity of firearms traffickers. This guide also highlighted ATF tools available to YCGII cities. These tools included trace analysis, mapping, and



investigative support; Online Lead, which allows users to query information to ascertain numerous leads for illegal trafficking patterns and identify possible perpetrators; and ATF's Regional Crime Gun Centers.

ATF has held YCGII conferences for ATF personnel and local police representatives. These conferences offered additional opportunities for program participants to be made aware of services available from ATF. The conferences also created a forum for sharing ideas related to implementation of the YCGII program.

ATF made electronic trace submission available to YCGII cities. This enabled ATF field offices and police departments to submit and store crime gun trace information electronically. They were also developing an Internet submission system, which will speed up the trace process by allowing police departments to submit trace requests and receive trace results over the Internet.

Comprehensive tracing was an important element of YCGII. ATF reviewed traces submitted by each YCGII city and compared this information to the number of guns recovered to determine which cities performed comprehensive tracing. ATF met with the chiefs of police for cities that did not perform comprehensive tracing to determine how to improve their performance. ATF assisted cities that were having difficulties by supplying contract employees (retired police or ATF special agents). These contractors assisted the police departments in the proper methods of gathering, entering, and using trace information. ATF also supplied computers if necessary. Cities that chose not to comply were terminated from the YCGII program. To date, two cities have been terminated, Inglewood, California and Bridgeport, Connecticut. Omaha, Nebraska opted not to participate in YCGII.

ATF developed a new Memorandum of Understanding, which highlighted YCGII objectives and re-enforced the understanding that the parties would work together to reduce firearms trafficking and firearms crimes involving youths.

Performance Measures and Data Verification Needed

In our prior audit, OIG found that ATF had not developed specific performance measures, which assessed the program's impact on youth violent crime rates in YCGII cities. We also found that ATF

had not developed a formal process for verifying statistical information that had been reported to Congress about the program results.

ATF agreed to develop new performance measures, unique to YCGII that would measure the program outcomes. ATF also agreed to take steps to ensure the accuracy of performance data.

Corrective Action Taken

ATF's corrective actions for developing new performance measures ensuring data accuracy had not been completed as of the end of our audit fieldwork. In December 2001 ATF issued a report to the Subcommittee on Treasury, Postal Service and General Government. In this report ATF stated that efforts to develop YCGII performance measures were ongoing, and that their goal was to measure the effectiveness of YCGII in each city.

ATF is developing a method for measuring the performance of IVRS, which measures the actual outcome of that program. YCGII is one of several subsets of IVRS. ATF feels that it is easier to measure the performance of the entire program rather than the individual parts. They plan to compare the change in crime rate in selected cities that have an IVRS concentration to similar cities without an IVRS concentration. ATF expects to include this new performance measure in its 2004 budget submission. At the time of this report, new performance measures were not yet in place. In addition, changes to the IVRS performance measures are necessary to ensure that the impact of YCGII is properly reflected. This issue is discussed in detail in Finding 2 of this report.

ATF formed a partnership with the National Institute of Justice for a demonstration evaluation of the effectiveness of the YCGII program. This evaluation was going to be used to generate additional best practices. ATF also contracted with the Federal Consulting Group and the University of Michigan to conduct surveys in 50 YCGII cities to measure customer satisfaction with regards to its performance in those cities.

To improve the accuracy of data used to measure performance, ATF issued instructions to field personnel to clarify the criteria for classifying a case as YCGII. Despite this effort, inconsistencies exist between field offices. Cases considered YCGII in one city

may not be in another location. This issue is discussed in Finding 3 of this report.

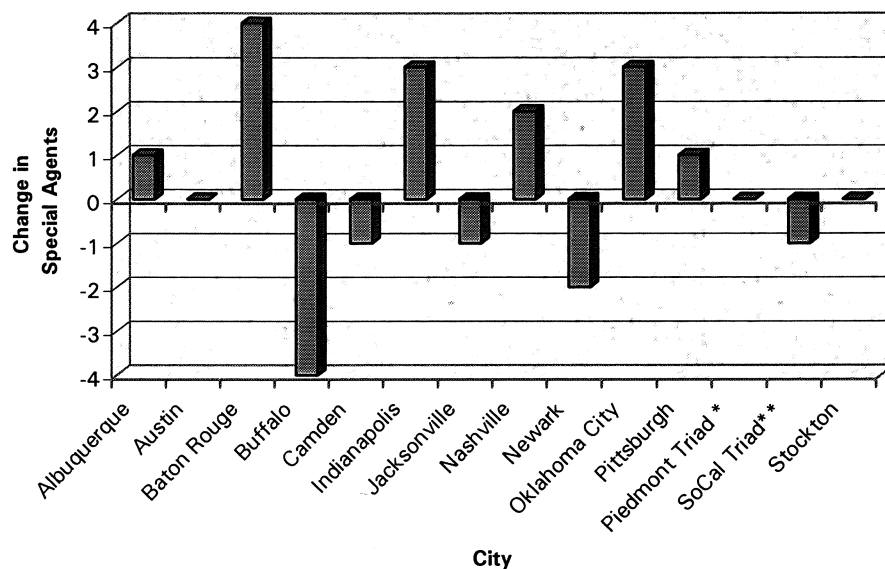
Findings and Recommendations

Finding 1 ATF Needs to Periodically Adjust Their Staffing Levels to Ensure Proper Implementation of YCGII

Field offices may not have received additional staffing as a result of their cities' participation in the YCGII program. The YCGII Director stated that in general, ATF planned an average staffing level instead of a set number per YCGII city. This method has not increased special agents and inspectors in all YCGII cities. While Field Operations does have a staffing model, this model has not always changed to reflect the added staffing requirements of YCGII. Actual staffing levels in YCGII cities have not always increased either. ATF's organizational structure also contributed to the staffing situation. Field office staffing constraints and other ATF mandated responsibilities may result in limited resources available for participating YCGII cities and reduce the effectiveness of the program.

In their 2001 budget submission, ATF requested 72 special agents and 98 inspectors, to add 12 new YCGII cities. While ATF in fact added 14 YCGII cities, staffing in those cities increased by a total of only 17 special agents and inspectors combined. As Chart 1 on the following page demonstrates, special agents in the new cities did not always increase.

Chart 1
Change in Special Agents for YCGII
Cities Added in 2001



* Greensboro, High Point, and Winston-Salem are the Piedmont Triad.

** Santa Ana, Anaheim, and Long Beach, are the SoCal Triad.

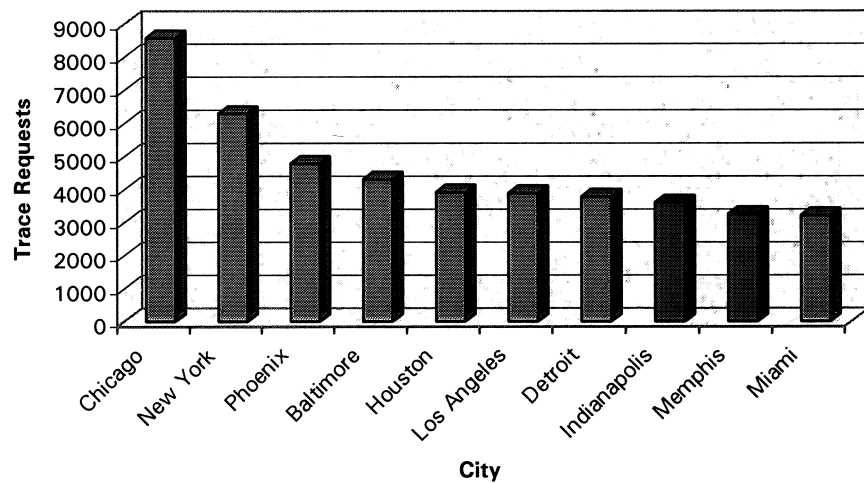
Three cities had no increase in special agents and five cities actually had fewer special agents than before being designated a YCGII city. There was a net increase of only five special agents in the fourteen new YCGII cities.

The YCGII Director stated that in general, ATF planned eight FTEs for each YCGII city, which normally included six special agents, an inspector, and a support person. However, these personnel work other cases in addition to YCGII. The Assistant Director of Firearms, Explosives and Arson (FEA) issued several memorandums that detailed the type of cases and inspections that should be charged to the YCGII program. These memorandums stressed the need to charge hours to YCGII when appropriate.

In the 2001 budget submission, ATF stated that though enforcement focused on youth offenders and their illegal sources of crime guns, YCGII could achieve a significant and lasting reduction in youth violence. However, cities with large numbers of crime

guns¹ recovered were not always adequately staffed. For example, Chart 2 shows that Indianapolis and Memphis have a large number of firearms trace requests but only a group of 11 and 10 special agents, respectively. The other cities listed have an average of 40 special agents. These single groups were responsible for investigating bombings, arson, and other firearms related cases, in addition to YCGII. Consequently, they may not work as many YCGII cases. Indianapolis for example had only nine YCGII cases for fiscal years 2001 and 2002 (as of May 21, 2002).

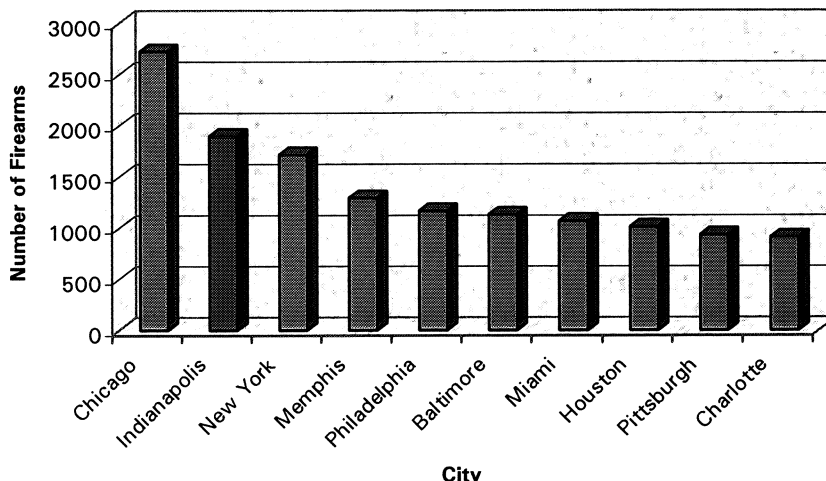
Chart 2
YCGII Cities with the Most Trace Requests



Indianapolis also had 1,896 firearms traced to FFLs in calendar year 2000, second only to Chicago as shown in Chart 3. Over 69 percent of these firearms were from dealers who had 25 or more guns traced to them. This was the highest percentage for any YCGII city. In fact, over 1,300 guns were traced to just 10 dealers. While the concentration of crime gun traces among a small number of licensed dealers was not necessarily an indication of a crime, it provided an important opportunity for law enforcement agencies to focus limited investigative and regulatory resources on identifying potential illegal gun traffickers. Forty-one percent of the firearms recovered in Indianapolis were in the possession of individuals who were 24 or younger.

¹ Appendix 3 lists each YCGII city and its trace requests.

Chart 3
Firearms Traced to FFLs
Calendar Year 2000

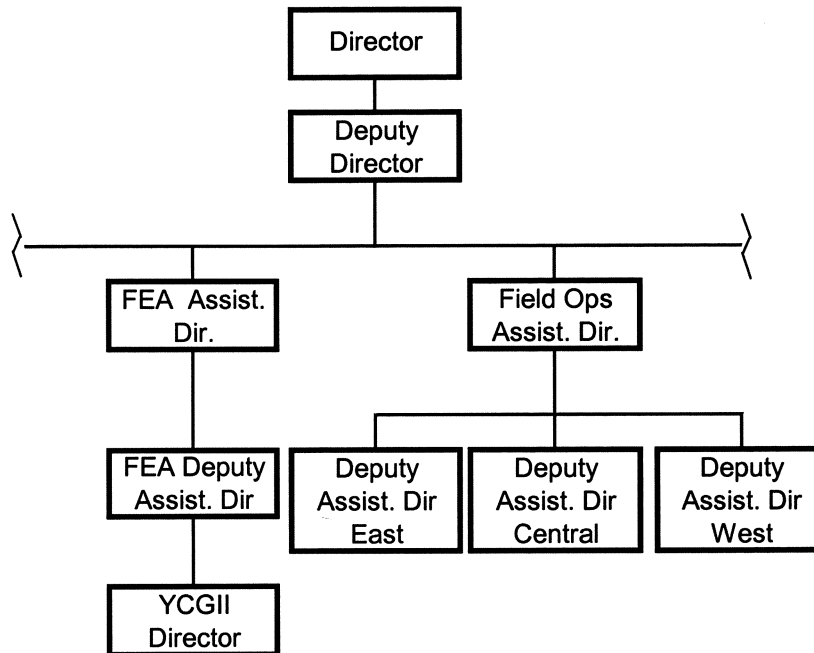


Several factors have contributed to inconsistent YCGII staffing levels.

- The YCGII program has grown rapidly. YCGII staffing more than doubled since October 1999, (211 FTEs to 480 FTEs);
- Other ATF programs have grown. The number of field division personnel increased by 18 percent in the same period (2,689 to 3,179).
- It takes a significant amount of time to staff a YCGII city. For example, time is needed to hire, train, and relocate special agents and inspectors.

Another factor that contributed to the YCGII staffing problem was ATF's organization structure. FEA is responsible for making YCGII policy. However, they do not have direct control of the personnel needed to implement that policy. These personnel work for the three Field Divisions of Field Operations (FO), which is responsible for implementing other ATF programs, in addition to YCGII. (See Chart 4). While FO ultimately has responsibility for staffing levels, ATF believes FEA and FO work together, to staff YCGII cities and to implement YCGII. This structure limits the YCGII Director's authority to enforce those policies.

Chart 4
ATF Organizational Structure



A joint effort between ATF and local authorities is essential to an effective YCGII strategy. State and local authorities came in contact with the majority of recovered crime guns. Their commitment to comprehensive tracing was important to the success of YCGII. ATF had the ability to trace firearms from manufacturer to dealer and analyze the data. They can then use Federal firearms laws to target illegal firearm traffickers who exceed boundaries of State and local authority or where no State law applies.

The staffing model for field offices lists a target number of special agents and inspectors for each field office. However, this model may not allow sufficient staffing for YCGII and the additional duties these offices must perform. The staffing model (as of August 11, 2002) showed very little change in the target staffing for YCGII cities added in 2001 and their staffing levels prior to being designated YCGII. In the ten YCGII cities that will be added in FY 2003, only one had a significant increase in staff. Five of the cities will each get two additional staff and the remaining four will not get any more staff.

We agree with ATF's implementation of the Project Safe Neighborhoods program in smaller cities. ATF should pursue violations of federal law involving youths regardless of where they occur. However, YCGII cities are developing leads through comprehensive crime gun tracing. Failure to follow these leads would reduce the impact of the YCGII program and defeat the purpose of comprehensive crime gun tracing. This could also reduce the incentive for State and local agencies to participate in YCGII and comprehensive crime gun tracing as well.

Recommendations

The ATF Director should ensure that:

1. The staffing for field offices is adjusted to ensure that YCGII cities are staffed in proportion to their YCGII activity.

Management Comments

ATF concurred with this recommendation. As a result, ATF will continue to examine their staffing model to adjust them for crime rates and varying needs of the individual localities.

OIG Comments

We consider this recommendation to have a management decision. Subsequent to receiving ATF's official response, management provided a projected final action date of July 31, 2003.

2. The staffing for field offices is periodically re-evaluated as YCGII cities are added and additional staffing becomes available.

Management Comments

ATF concurred with this recommendation. ATF performs periodic reviews of staffing levels of all field units. Until personnel hired as backfill are more fully trained and developed, it continues to follow Congressional guidance of assigning agents with experience to these investigations. Staffing for new YCGII cities will be part of the staffing model discussed in Managements Comments to Recommendation 1.

OIG Comments

We consider this recommendation to have a management decision. Subsequent to receiving ATF's official response, management provided a projected final action date of July 31, 2003.

Finding 2

ATF Needs Performance Measures That Reflect the Impact of YCGII

ATF is in the process of developing performance measures that show YCGII's impact on youth crime. The Government Performance and Results Act of 1993 requires that Government agencies put a greater emphasis on the results (outcomes) of Government programs, rather than focusing on program outputs. A major obstacle in developing outcome related performance measures has been determining whether there was a causal relationship between program outputs and the desired outcomes. Consequently, we recognize that the impact of the YCGII program will be difficult to measure. In a prior report we stated, "Performance measurement for Federal law enforcement is still an evolving process. To date no one has designed a clear and complete set of outcome-related performance measures for Federal law enforcement. These limitations are substantial and long-standing, and will not be quickly or easily resolved."²

The YCGII Director stated that YCGII performance was going to be measured as part of IVRS, since YCGII was a subset of that program. ATF planned to compare the change in crime rate in selected cities that have an IVRS concentration to similar cities without an IVRS concentration. To have an IVRS concentration, a city had to have three of the four IVRS programs, which are:

- A Firearms Crime Task Force
- YCGII
- National Integrated Ballistics Information Network
- Gang Resistance Education and Training.

While the new IVRS performance measure was a step in the right direction, we do not believe it will be effective for measuring YCGII

² Better Performance Measures Are Needed For Treasury Enforcement Programs (OIG-02-013)

results. All the selected IVRS cities and all but one of the comparison cities are YCGII cities. Consequently, YCGII cities are compared to YCGII cities. In addition, a large percentage of YCGII cases we examined were a result of crimes that were not related to the designated YCGII cities. For example, 19 percent of Chicago's YCGII cases involved crimes in other cities within ATF's Chicago Field Division such as Rockford, Springfield, or Fairview Heights, Illinois and were investigated by ATF's field offices in those locations. None of these were designated YCGII cities. These cases would not have a direct impact on YCGII performance in Chicago. In Atlanta, 43 percent of the YCGII cases were from other locations. These two factors would make it difficult to measure YCGII performance using ATF's proposed IVRS model.

In addition, ATF did not determine whether there was a causal relationship between IVRS outputs and the desired outcomes. In other words did crime decrease because of ATF efforts, or because of an external factor, such as general economic conditions, or the efforts of State and local agencies? The General Accounting Office (GAO) addressed the issue of causal relationships in a recent report³. This report stated that program evaluations, systematic studies that use objective measurement and analysis to answer specific questions about how well a program is working, could help to measure a program's effectiveness. Where complex systems or events outside a program's control also influence its outcomes, impact evaluations use scientific research methods to establish the causal connection between outcomes and program activities and isolate the program's contribution to those changes. In another report⁴, GAO stated that program evaluations could be used to explore the benefits of a program, measure program performance or explain performance results.

ATF contracted with the University of Michigan to conduct a survey of local law enforcement personnel in YCGII cities. The survey used the American Customer Satisfaction Index to determine the effectiveness of the program. The results of this survey showed the YCGII program was providing service equal to the average private sector service provider and the average government agency. The importance of YCGII to local agencies was rated very high, as were ATF special agents. However, the

³ Program Evaluation Studies Help Measure or Explain Performance (GAO/GGD-00-204).

⁴ GAO-01-712 Treasury's Status of Achieving Key Outcomes.

survey determined that information provided by ATF, such as annual reports and crime gun trace reports needed to be clearer and more useful.

Customer satisfaction is important, since ATF relies on cooperation from State and local law enforcement to accomplish their mission. In fact we recommended a customer satisfaction survey in a prior audit.⁵ However, customer satisfaction was just one of several recommendations in that report. The report also recommended surveys of U.S. Attorneys to determine the quality of Treasury law enforcement cases and an employee satisfaction survey of ATF personnel. While these surveys would provide valuable information to ATF, they will not measure their performance. In fact, Treasury's response to this report states that a customer satisfaction survey would be an output measure instead of an outcome measure. We agree with this assessment. Customer satisfaction does not measure the outcome of the YCGII program.

Recommendation

The ATF Director should ensure that:

1. The proposed IVRS performance measures are re-examined to ensure that they reflect the performance of all IVRS programs, including YCGII.

Management Comments

ATF concurred with this recommendation. They are in the process of reviewing reports by the Department of Justice in specific IVRS areas and they have distributed an internal survey to their affected offices to determine what other factors are present that might have a positive or negative impact on firearms crime. ATF stated that the performance measures are a work in progress and they will continue to refine performance measures to ensure accuracy in measuring YCGII efforts.

OIG Comments

We consider this recommendation to have a management decision. Subsequent to receiving ATF's official response,

⁵ Better Performance Measures Are Needed For Treasury Enforcement Programs (OIG-02-013)

management provided a projected final action date of May 31, 2003.

Finding 3 ATF Field Offices Were Not Consistent When Identifying YCGII Cases.

ATF field offices were not consistent when identifying YCGII cases. In the “Best Practices” Guide⁶ ATF stated that any violation of Federal firearms laws involving a person 24 years of age or younger was a YCGII case. However, other ATF guidance gave other definitions of a YCGII case. As a result, cases considered YCGII varied between field offices. Therefore the numbers used to measure YCGII outputs may not accurately reflect the program’s accomplishments.

Table 1 shows that ATF guidance included other definitions for cases to be included as YCGII.

Table 1

<i>Reference</i>	<i>Criteria</i>
Best Practices Guide	Any violation of Federal firearms law involving a person 24 years of age or younger
ATF Intranet	Efforts associated with crime gun tracing i.e., inspections, interviews, reviewing reports, preparing reports, etc.
YCGII Director	Firearms trafficking cases into or out of a YCGII city

We reviewed YCGII files at three ATF field offices, to determine if the YCGII definition was being implemented consistently. The offices we visited were Chicago, Indianapolis, and Atlanta. In addition, we reviewed ATF’s Office of Inspections finding related to cases they examined in its Boston field office. There was at least one case in each location that was not a YCGII case. In Atlanta 3 cases had no connection to YCGII, 6 cases were entered

⁶ “Best Practices” Guide for ATF Field Operations, September 2001

in error and 15 cases were trafficking but did not involve an individual age 24 or under. Table 2 summarizes the cases reviewed.

Table 2

	<i>Cases Reviewed</i>	<i>Youth * Involved</i>	<i>No Youth * but Trafficking</i>	<i>No YCGII Nexus</i>
Atlanta	82	58	15	9 ⁷
Chicago	50	49	0	1
Indianapolis	12 **	11	0	1
Boston ⁸	19	15	0	4

* Youth is anyone age 24 and under

** We examined all YCGII cases in Indianapolis

Atlanta personnel stated that they charged trafficking cases to YCGII even if there was not a youth involved because Georgia is a source of guns trafficked to other YCGII cities. However, eight of the cases Atlanta considered trafficking were multiple purchases but there was no other indication of trafficking or any violation of a firearms law. They would merely call the person who purchased more than one firearm, to determine the reason for the multiple purchase.

Chicago and Indianapolis personnel stated that inquiries about multiple purchases did not constitute a YCGII case. Indianapolis commented that they opened an investigation for cases the U.S. Attorney would prosecute. Chicago would not open a case unless there was criminal intent. YCGII coordinators in Seattle and Denver stated that they would not code a case as YCGII unless there was a person age 24 or under, or a reason to believe guns were being supplied to gangs.

⁷ Six of these cases were opened in error.

⁸ ATF's Office of Science and Technology issued a report, "Report on the Review of Boston Field Division's Youth Crime Gun Interdiction Initiative". As part of that report, they reviewed 19 YCGII cases at the Boston Field Office. They determined that 7 were not YCGII. Because we included all cases involving a firearms crime and a youth as YCGII, not just those in the city of Boston, we concluded that only 4 were not YCGII.

ATF had not clearly defined what constituted a YCGII case. In the "Best Practices" Guide⁹ ATF stated that any violation of Federal firearms laws involving a person 24 years of age or younger was a YCGII case. On ATF's intranet website other criteria was used to define a YCGII case. It stated that any investigation that was the result of comprehensive tracing was also a YCGII case.

The YCGII Director stated that in addition to cases dealing with youths, any case involving firearms trafficking from a source state to a YCGII city was a YCGII case. For example, many guns recovered in Chicago were purchased in southern states, therefore investigations of FFLs and firearms purchasers in Mississippi can be coded to YCGII.

Since there is not a uniform methodology for determining what is a YCGII case, numbers reported in support of YCGII may not be reliable.

Recommendation

The ATF Director should ensure that:

1. Clear and concise criteria are developed to ensure consistent implementation of YCGII.

Management Comments

ATF agrees that clear and concise criteria are necessary. They feel that current criteria are clear and concise. To ensure validity of information, ATF is developing a plan to sample and validate case/time data. They believe this will help to address the concerns raised by the OIG.

OIG Comments

We consider this recommendation to have a management decision. Subsequent to receiving ATF's official response, management provided a projected final action date of September 30, 2003.

⁹ "Best Practices" Guide for ATF Field Operations, September 2001

We appreciate the cooperation we received from ATF officials during this audit. If you wish to discuss this report, you may contact me at (312) 886-6300.


Roberta N. Rickey

We conducted this review to assess the corrective actions taken by ATF in response to our audit report issued in August 2000 on YCGII program implementation¹⁰.

The specific objectives were to determine if ATF had:

- Developed and implemented formal guidance and methodology to assist YCGII cities and field offices and to ensure the accuracy of YCGII statistical data.
- Implemented electronic trace procedures at YCGII cities.
- Ensured that local agencies were aware of available ATF resources.
- Developed YCGII performance measures that accurately measure YCGII's impact on traffickers who supply firearms to youths.

To accomplish our objectives, we conducted work at ATF's Headquarters in Washington, D.C., where we interviewed the Director of the YCGII Program and ATF officials from the Strategic Planning Office; FO; FEA's Operations Support Section; and the Firearms Programs Division. In addition, we interviewed officials from the NTC and the Crime Gun Analysis Branch. We reviewed policies and procedures implemented as a result of our previous audit, analyzed ATF staffing in YCGII cities, and we reviewed the status of YCGII performance measures.

We performed fieldwork in Atlanta, Chicago, and Indianapolis, where we reviewed YCGII case files and interviewed ATF officials and local law enforcement personnel. We interviewed YCGII coordinators and police officers from several other YCGII cities. We also attended ATF sponsored YCGII conferences in Las Vegas, Nevada, and Nashville, Tennessee.

We conducted our audit between April and June 2002 in accordance with generally accepted government auditing standards.

¹⁰ Final Report on the Bureau of Alcohol, Tobacco and Firearms' Implementation of the Youth Crime Gun Interdiction Initiative (OIG-00-119), August 21, 2000.

	OIG Recommendation	ATF Action Taken
●	Recommendation 1: Update YCGII to include a model of best practices.	Developed a best practices pamphlet.
●	Recommendation 2: Develop a methodology for allocating special agents to YCGII.	Developed a methodology to allocate special agent man-hours to the YCGII program.
●	Recommendation 3: Ensure that field offices implement the agent allocation procedures.	Implemented the special agent resource allocation methodology.
●	Recommendation 4: Develop more specific guidance for cities to determine what activities are important.	Developed guidance for cities to use to determine what activities are important and what resources are necessary.
●	Recommendation 5: Terminate cities that cease YCGII participation.	Developed procedures to terminate non-participating cities from YCGII.
●	Recommendation 6: Help cities implement electronic trace system.	Helped cities implement electronic trace submission systems.
●	Recommendation 7: Make cities aware of tools available from ATF.	Facilitated police department access to ATF's analytical tools.
●	Recommendation 8: Develop performance measures that gauge the impact of YCGII on gun traffickers who supply firearms to youths.	ATF will develop performance measures for YCGII that gauge its impact on crime gun traffickers who supply firearms to youths.
●	Recommendation 9: Develop procedures to verify the validity and accuracy of performance measures.	ATF will develop procedures to verify the validity and accuracy of data used to measure YCGII performance.

Action was sufficient = ●

Further action required = ●

Appendix 3
Firearms Traces by YCGII City in 2000

City	Traces	City	Traces
Albuquerque	900	Memphis	3,244
Atlanta	1,141	Miami	3,204
Austin	295	Milwaukee	2,283
Baton Rouge	1,068	Minneapolis	949
Birmingham	1,851	North Carolina Triad	699
Baltimore	4,295	Newark	584
Boston	896	New Orleans	1,965
Buffalo	836	Nashville	2,297
California Triad	139	New York	6,284
Camden	165	Oakland	595
Chicago	8,570	Oklahoma City	856
Charlotte	2,041	Philadelphia	3,041
Cincinnati	877	Phoenix	4,778
Cleveland	979	Pittsburgh	2,481
Dallas	3,005	Portland	857
Denver/Aurora	937	Richmond	1,109
Detroit	3,771	Salinas	327
Gary	792	Seattle	223
Houston	3,909	San Antonio	1,294
Indianapolis	3,592	San Jose	1,476
Jacksonville	1,366	Stockton	352
Jersey City	184	Saint Louis	2,612
Los Angeles	3,877	Tampa	1,055
Louisville	1,637	Tucson	2,135
Las Vegas	636	Washington	1,959
		Total	94,418



DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

OCT 28 2002

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MEMORANDUM TO: Regional Inspector General for Audit

FROM: Director

SUBJECT: Response to a Draft Audit Report on ATF's
Youth Crime Gun Interdiction Initiative
(YCGII) Program Implementation

This memorandum is in response to your draft audit report dated September 19, 2002, evaluating the implementation of recommendations made in the Office of the Inspector General (OIG) audit 00-119, Implementation of YCGII (Final Report issued August 21, 2000).

This report reflects discussions that occurred with the OIG audit team. Your report provides three findings with four recommendations. ATF's responses are provided below, addressed in the order in which the draft presented them.

FINDING 1: ATF NEEDS TO PERIODICALLY ADJUST ITS STAFFING LEVELS TO ENSURE PROPER IMPLEMENTATION OF YCGII

RECOMMENDATION:

ENSURE THAT STAFFING FOR FIELD OFFICES IS ADJUSTED TO ENSURE THAT YCGII CITIES ARE STAFFED IN PROPORTION TO THEIR YCGII ACTIVITY.

ATF concurs with the OIG's recommendation and has stated such as early as October 5, 2000, during the House Appropriations Subcommittee hearing on YCGII. I addressed the original staffing model as a base requirement to initiate a focus on trafficking investigations centered on youths and juveniles, and

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this model was intended as an average level of personnel designated. Staffing requirements for different locations could be adjusted to crime rates and varying needs of individual localities. This staffing policy also takes into consideration that many times the gun trafficking may be conducted in another source State, while the case may directly impact or have a nexus to an YCGII city. This was also a factor in the changes made to the field reporting requirements. Periodic review of those reporting time to this project is conducted, and the projected end of the year shows a total of 673 agents, inspectors, and support personnel FTE applied to YCGII cases. The final FTE will be available with the FY-04 Congressional budget.

As we discussed with the OIG personnel, ATF needs flexibility to dedicate resources across the country. We believe that eight (8) personnel per city reflect an average FTE effort rather than a firm number for each YCGII city. YCGII work is only a part of the total staff years of ATF personnel in a given city. Non-YCGII work, arson work, or explosive work may also surface in a city that does not have a dedicated YCGII group.

When a city begins participation in YCGII, it typically takes a period of time to realize the full impact of the initiative. The concerns of program staffing, establishing local goals, training ATF and city personnel, comprehensive tracing, and case initiation must be addressed. Comparing a newer YCGII city (Indianapolis) to older established YCGII cities (e.g., Chicago) (See charts 2 and 3) ignores the element of time required for the newer city program to become fully productive.

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RECOMMENDATION:

**ENSURE THE STAFFING FOR FIELD OFFICES
IS PERIODICALLY RE-EVALUATED AS YCGII
CITIES ARE ADDED AND ADDITIONAL
STAFFING BECOMES AVAILABLE.**

ATF concurs with the recommendation and does, in fact, perform periodic reviews of staffing levels of all field units. Until the personnel hired as backfill are more fully trained and developed, we will continue to follow Congressional guidance of assigning agents with experience to these investigations.

ATF must be able to apply resources to meet unexpected threats to public safety. Most recently, we have applied personnel to the investigation of the Midwestern pipe-bombings and the investigation in the aftermath of September 11. Currently, two YCGII cities, Washington, DC, and Baltimore, Maryland, are applying the majority of their personnel resources to assist State and local law enforcement in the pursuit of the Washington area sniper.

**FINDING 2: ATF NEEDS PERFORMANCE MEASURES THAT
REFLECT THE IMPACT OF YCGII**

RECOMMENDATION:

**ENSURE THAT THE PROPOSED INTEGRATED
VIOLENCE REDUCTION STRATEGY (IVRS)
PERFORMANCE MEASURES ARE RE-EXAMINED TO
ENSURE THAT THEY REFLECT THE
PERFORMANCE OF ALL IVRS PROGRAMS,
INCLUDING YCGII.**

ATF concurs that the IVRS measures cannot be used to strictly measure YCGII. However, we have always stressed that what makes our agency effective is the combination of all our enforcement and outreach programs. This is why we measure all of these factors together. It is, as stated on page 9 of the report,

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"easier to measure the performance of the entire program rather than the individual parts."

With respect to determining relationships between ATF programs and actual results, we are well aware that there may be other factors that affect crime rates. We are in the process of reviewing reports by the Department of Justice (DOJ) in specific IVRS areas and we have distributed an internal survey to our affected offices to determine what other factors are present that might have a positive or negative impact on firearms crime. ATF has worked closely with the evaluators of enforcement programs within DOJ and members of the academic community in developing these measures. We feel confident that, while the measures do not reflect what portion of the firearms crime decrease is attributable to ATF programs, they demonstrate that there is some impact that would not exist without law enforcement participation.

ATF disagrees with the audit's findings regarding customer satisfaction surveys, in particular, page 17, paragraph 3. The Bureau surveyed local police with a knowledge of YCGII, local prosecutors, and U.S. Attorneys as our customer base and the end users of our services. A highly satisfactory rating was received from these groups, and we believe that is indicative of our efforts in criminal investigations. In addition, ATF provides intelligence data and analyses of firearms data that result in a higher number of successful prosecutions and development of criminal cases on a Federal, State, and local level which ultimately results in a safer and sounder America.

The YCGII program encompasses criminal investigations, Federal Firearms Licensee (FFL) inspections, and firearms tracing. The program is designed to provide appropriate training to law enforcement organizations, and provide intelligence data and analyses to disrupt the flow of illegal firearms. The end users have highly rated ATF activities and have identified those areas that can be improved. We have, therefore, benchmarked

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our activities. Identifying performance measures reflecting a program, which is so inherent to the larger enforcement effort, IVRS, is difficult at best. However, the previous auditors (2000 audit) agreed that a customer survey would be an accurate measure of the YCGII program. During the last half of 2002, ATF in cooperation with the Federal Consulting Group (FCG) and the University of Michigan, conducted such a survey. Results were obtained and efforts to correct past problems were instituted. The 2002 auditors did not find that this was adequate. ATF will continue to refine performance measures to ensure their accuracy in measuring YCGII efforts.

**FINDING 3: ATF FIELD OFFICES WERE NOT CONSISTENT
WHEN IDENTIFYING YCGII CASES**

RECOMMENDATION:

**ENSURE THAT CLEAR AND CONCISE CRITERIA
ARE DEVELOPED TO ENSURE CONSISTENT
IMPLEMENTATION OF YCGII.**

ATF believes that clear and concise criteria instruction has been provided to the field. The previous audit discovered a number of errors that could be attributed to coding errors. Since that time, ATF has endeavored to provide guidance to the original YCGII cities, as well as the newer YCGII cities. Coding errors do occur; however, with the recently conducted instructional conferences, we believe they will decrease dramatically. During 2002, ATF conducted three regional training conferences across the country and trained over 400 Federal, State and local authorities. YCGII coordinators from each of the 23 field divisions, attended, as did local law enforcement personnel working on task forces, local district prosecutors, U.S. Attorneys, and ATF supervisors. This was an effort to bring all personnel together to discuss problems, definitions, and success stories centering on YCGII casework. Two of the OIG auditors also attended the conferences. In addition, the ATF IntraWeb was updated

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with the latest forms, contacts, and Q&A's to assist field personnel.

One of the lessons learned at the conferences was that a YCGII case could be slightly different depending on the part of the country or the local or State laws in effect. In some YCGII cities, the U.S Attorney's office may interject stricter rules for prosecution which would limit the type of YCGII cases initiated. Some cities are located in "source States" which in effect, allows for a broader interpretation of YCGII cases.

The example given on page 18, table 1, cites three different definitions of a YCGII case. The first two, "Best Practices" and "YCGII Director" deal with general guidelines for a definition of YCGII casework. The Intraweb reference deals with administrative coding of time expended to YCGII casework. The criteria attributed to the YCGII Director is also correct when it applies to guns that have a nexus to or from a YCGII city, i.e., Atlanta, Georgia. These guidelines have been taught and discussed at the recent (2002) ATF YCGII conferences.

In response to the Atlanta example on page 19, questioning the investigations opened based upon multiple sales; ATF has published information in ATF YCGII Crime Gun Trace Report (2000), page ix, stating, "acquisition of handguns in multiple sales can be an important trafficking indicator." Numerous times in opening an investigation, it is alleged that a youth/juvenile is involved, or that a YCGII city is affected; however, this could change as the investigation develops. Therefore, we believe that an agent contacting a multiple sale purchaser can be a valuable investigative tool for YCGII purposes.

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In addition, as part of the findings of the Boston audit and to insure validity of information, ATF is presently developing a plan to sample and validate case/time data.

I appreciate the opportunity to provide comment. Should you need any further information concerning the contents of this document, please contact Bill Kinsella, YCGII Director, at (202) 927-8368.



Bradley A. Buckles

Central Region

Roberta N. Rickey, Regional Inspector General
Bradley Mosher, Audit Manager
Larry Fugate, Auditor in Charge
Kathleen Hyland, Auditor
Virginia Feliciano, Auditor
Shazia Aleem, Student

Department of the Treasury

Office of the Under Secretary of the Treasury for Enforcement
Office of the Assistant Secretary of the Treasury for
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Assistant Director, Office of Inspection

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